



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1868

JUL 30 2003

Ms. Mary Lou Capichioni
Director, Remediation Services
Corporate Environmental Services
The Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, Ohio 44115-1075

Re: Response to Questions Raised by the Sherwin-Williams Company
January 2002 Revised Work Plan for RI/FS Activities; Gibbsboro, NJ

Dear Ms. Capichioni:

A meeting was held on June 19, 2003 between EPA, the Sherwin-Williams Company (SWC), and its contractor, Weston Solutions, Inc. (Weston). SWC requested the meeting to discuss comments it had on EPA's edited and revised version of the RI/FS Work Plan provided by EPA in a letter to SWC dated June 6, 2003.

There were seven items that EPA indicated that it would resolve for SWC at the outcome of the June 19, 2003 meeting. On June 20, 2003 SWC requested an extension to the deadline date to submit the Final RI/FS Work Plan while SWC resolved the outstanding items with EPA. Subsequent to the meeting, SWC provided to EPA the U.S. Avenue Burn groundwater data on June 25, 2003. On July 1, 2003 EPA granted SWC's extension request of August 1, 2003 to submit the Final RI/FS Work Plan. Further, SWC raised additional questions that it wished EPA to resolve on July 9, 11, and 16, 2003.

EPA has included two attachments to this letter which will resolve the questions raised by SWC during the June 19, 2003 meeting and the subsequent questions raised by SWC on July 9 and 11, 2003 pertaining to the remedial field investigation. EPA believes it is necessary to provide SWC resolution on these items since they pertain to the upcoming field work that is necessary for these Sites. EPA is still considering the thirty-nine items raised by SWC on July 16, 2003 on Sections 2.0 (Site Background and Physical Setting), 3.0 (Initial Evaluation of Existing Data), and 4.0 (Work Plan Rationale).

As specified under paragraph 31 of the AOC for a RI/FS, EPA retains the right in its sole discretion to seek stipulated or statutory penalties, perform its own studies, complete the RI/FS (or any portion of the RI/FS) under CERCLA and the NCP, and seek reimbursement from the Respondent for its costs; and/or seek any other appropriate relief if the subsequent final submission of the RI/FS Work Plan does not fully reflect EPA's directions for changes.

EPA requests that 7 copies of the final RI/FS Work Plan with EPA's revisions be submitted to the EPA's project coordinator and 2 copies be sent to the NJDEP project manager, John Doyon.

If you have any questions on this matter, you may contact Mr. Emmet Keveney, P.E., of my staff, at (212) 637-3916, or if you have any legal concerns, Mr. Carl Howard, Esq., at (212) 637-3216.

Sincerely yours,



Carole Petersen, Chief
New Jersey Remediation Branch

Enclosures

cc: Allen Danzig, Esq., SWC w/encls.
John Gerulis, SWC w/encls.
Daniel Kopcow, Weston w/encls.
John Doyon, NJDEP w/encls.
Susanne Peticolas, Gibbons, Del Deo, Dolan, Griffinger, & Vecchione w/encls.

bcc: Carl Howard, ORC 16th fl. w/encs.
Emmet Keveney, ERRD-NJRB w/encs.
Bonita Green, MS-211 w/encs.
Jeff Josephson, ERRD-NJRB w/encs.

ADDITIONAL QUESTIONS/ISSUES (NON-HISTORIC SECTIONS)

RI/FS DOCUMENT REVISIONS

GIBBSBORO, NEW JERSEY

JUNE 27, 2003

SHERWIN-WILLIAMS' RI/FS WORK PLAN - JANUARY 2002

EPA'S RESPONSE TO COMMENTS RECEIVED FROM

SHERWIN-WILLIAMS ON JULY 9, 2003

DOCUMENT	SECTION	QUESTION	COMMENT	RESPONSE
Cover Letter	1 st page	Specifies total of 5 copies (7 EPA, 2 NJDEP). Consent Order requires 13 (8 EPA, 5 NJDEP).	Please clarify. Would prefer 9 copies since the documents are very expensive to reproduce.	Since this is a final document believe may only need 9 copies of the 13 specified in the Administrative Order on Consent (AOC). If additional copies are needed, we will inform the Sherwin-Williams Company (SWC).
Cover Letter	Item #4	Requires that 100 and 500 year flood plains be added to maps.	FEMA does the mapping based in regional maps and those lines do not much up to our high-resolution mapping. How should we resolve this issue?	If SWC is concerned that the FEMA lines for the 100-year and 500-year floodplains appear to cut across areas of differing elevations, EPA recommends that if SWC knows the elevation for the 100 year and 500 year floodplain that could be utilized with the high-resolution mapping. Otherwise, SWC could take the FEMA lines and "correct" them with more site-specific data. It is our understanding that SWC used Floodprone Maps from NJDEP GIS 1996 to show the 100-year floodplain along Hilliard's Creek for Figure 5-9. Coastal flood data and Digital Elevation Model (DEM) data can be found on the NJDEP GIS url: http://www.nj.gov/dep/gis .
Cover letter	Item #10	EPA requests that old EPA borings along the Dump Site fence be shown as proposed for resampling (change red dots to green triangles). Our green triangles were shown as being "couple of feet" away from the old locations, partly for visibility, partly for the fact that even if you could find the exact same spot, you would still not want to sample there, since that very spot has already been disturbed. Also, why do we need to resample boring 26, if we are taking two more borings on	Should we change those points to another symbol and label them as "previously sampled locations to be resampled" and remove the green triangles that are now next to them? Or is EPA looking for additional samples?	SWC does not need to change the symbol and label on Figure 5-4 of the RI/FS Work Plan, and its duplicate figure specified in the SAP and QAPP. However, the intent of EPA's comment #167(c) in our April 19, 2001 and comment # 10 in our June 6, 2003 letters to SWC was that samples were to be collected along the perimeter of the fence line in close proximity to the previous EPA sample points used for determining where the fence line should be erected to satisfy the Removal AOC. Therefore, upon further review of Figure 5-4, it has been determined that there are three sample points that SWC did not specify on the Figure based on our previous comments. Those sample points are 1, 2, and 10. Please denote a proposed soil sample location in close proximity to each of these points past the current fence line as was done for the other proposed sample points currently noted by SWC on the figure. Do not need to resample point 26. However, ensure that the proposed soil sample point to the left of sample point 26 is

**ADDITIONAL QUESTIONS/ISSUES (NON-HISTORIC SECTIONS)
RI/FS DOCUMENT REVISIONS
GIBBSBORO, NEW JERSEY
JUNE 27, 2003**

		<p>either side?</p> <p>If we are sampling 5 but not 6, why should we sample 10 if we are sampling at 71?</p>		<p>taken during the field activities in close proximity to the current fence line.</p> <p>Requesting a proposed sample point in close proximity to sample point 10 to determine if contamination exists south of the current fence line as noted above. The five additional sample points (one of which SWC appears to be denoting as 71 in Figure 5-4 and under the column titled "requirement" to the left) specified along the western perimeter of the fence line along Route 561 were requested by EPA in comment #167(d) in our April 19, 2001 letter to SWC to determine if contamination exists to the west of the current fence line and potentially below the Route 561 roadway. Further, sample points 71 and 10 are approximately 50 feet away from one another which is the grid spacing proposed for soil sampling past the perimeter of the fence line. Therefore, both sampling locations need to be denoted as proposed soil sample locations on Figure 5-4 of the RI/FS Work Plan, and its duplicate figure specified in the SAP and QAPP.</p>
SAP	5.15	Both hazardous and non-hazardous materials will be accumulated on-site for 90 days or less prior to disposal off-site.	Non-hazardous is 120	Sections 5.15 and 1.3.11.7 of the SAP, Section 2.1.10.7 of the QAPP, and Section 5.2.11.7 of the RI/FS Work Plan can be revised to specify that non-hazardous materials will be accumulated on-site for 120 days or less prior to disposal off-site.
SAP	Appendix B	Region 2 low flow does not mention impeller-type purgers.	We want to use variable rate Grundfos pumps.	<p>This is acceptable. However, SWC must follow the purging and sampling procedures stated in the Region 2 Low-Flow SOP (dated March 1998) specified in Appendix B of the SAP. The SOP specifies that SWC must purge at a rate of 200 - 500 ml/min, and collect samples while purging between a rate of 100 - 250 ml/min.</p> <p>While reviewing the SAP to answer SWC's recent round of questions, EPA noted that one item was missing from what needs to be labeled on each of the sample bottles specified under Section 4.2 (Sample Documentation) of the SAP and Section 5.8 (Sample Labeling) of the QAPP. The sample bottle, besides being labeled with the items currently listed in the SAP and QAPP, should also include any preservatives which may be added. This will not only ensure the staff at the lab that they are receiving samples which will be within holding time (by properly being preserved), but also that they may</p>

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RI/FS DOCUMENT REVISIONS
GIBBSBORO, NEW JERSEY
JUNE 27, 2003**

				potentially be handling potentially hazardous (after addition of the preservatives) samples. Revise the SAP and QAPP accordingly.
SAP QAP	4.2 5.7.2	Field logbooks will be used for documentation. Also, we are now planning to use digital cameras versus film.	Is the use of electronic-based entry acceptable? We are now planning to use digital cameras, PDAs and /or laptops to be downloaded to a server every evening.	EPA concerned about making changes in the entries. When using a bound field logbook and indelible ink, it is possible to keep track of any changes to entries as they happen pursuant to the procedures noted in Section 4.2 of the SAP and Section 5.7.2 of the QAPP. It is unclear how those procedures will be met using electronic means. SWC will need to add language to Section 4.2 of the SAP and Section 5.7.2 of the QAPP to specify how the procedures used to ensure the integrity of entries into the logbooks will be implemented using electronic means. Section 4.2.3 of the SAP specifies that digital cameras may be used.
SAP	Appendix B	Region 2 low flow spec	We may be using PDAs/iPAQs.	Understand that SWC may be using PDAs/iPAQs. Refer to our response above to SWC's questions on Section 4.2 of the SAP and Section 5.7.2 of the QAPP.

TOPIC	ITEM	SECTION(s)	SWC's COMMENT	6/19/03 MEETING OUTCOME / ACTION ITEM	RESOLUTION
Sampling Depths	12	5.2.2.2, 5.2.3.2, 5.2.4.4, 5.2.5.4, 5.2.6.2, 5.2.6.4, 5.2.7.4, 5.2.8.2	Depth of surface soil samples. Work Plan calls for all parameters collected 0 to 6" bgs except for VOCs collected from 18"-24".	Mike Sivak to contact TRW and discuss if 0-6" can be used at this site for residential lead risk assessment (since it is being conducted along with other contaminants of potential concern). Other issues to be discussed will be to determine if 0-6" is agreeable for non-residential areas, and if sieving of the soil (again, for a comprehensive risk assessment, not just lead) is required, and if 18-24" samples for VOCs can be used for the risk assessment.	<p>(a) SWC should implement the sampling scheme as specified in the current EPA edited version of the RI/FS Work Plan. In addition to what is already required in the RI/FS Work Plan, SWC may conduct the following additional sampling at residential properties:</p> <ol style="list-style-type: none"> 1. Grab discrete XRF lead samples (do not composite), at an interval of 0-1" bgs, from 10 of the 15 soil traverse borehole locations per residential property currently proposed in the RI/FS Work Plan. 2. Only the 10 XRF lead samples per residential property being collected from 0-1" bgs may be sieved. <p>(b) 0-6" can be used at this site for the residential risk assessment. Once the data has been collected for this first phase of the RI/FS, EPA will compare both sample horizons (0-1" and 1-6") to determine if the 0-1" depth can be eliminated.</p> <p>(c) With respect to a question regarding if the sampling interval 0-6" is agreeable for non-residential areas, and a question regarding if the sampling interval 18-24" for VOCs can be used for the risk assessment. Sampling for non-residential areas will be conducted as specified in the current EPA edited version of the RI/FS Work Plan and 18-24" samples for VOCs can be used for the risk assessment.</p>
Residential Sampling	13	5.2.7.4	Sherwin-Williams would like to discuss the residential sampling approach to insure that, characterization, risk assessment and delineation goals will be met.	Mike to review NJDEP's criteria (which will serve as ARARs for this site), which do not allow for composite sampling - in light of the requirement by the TRW to conduct composite sampling for residential lead risk assessments (i.e.,	Composite sampling shall not be conducted pursuant to N.J.A.C. 7:26E-3.4 which is an ARAR for the Sites. With respect to the residential sampling approach, EPA recommends that SWC speak to the residents prior to sampling to ensure that the residents have not moved sediment or soil from within the 100-year flood plain to another portion of their property. If so, some of the sampling points may need to be re-located, or additional sample points specified, to characterize those areas outside of the 100-year flood plain that may potentially be contaminated.

TOPIC	ITEM	SECTION(s)	SWC's COMMENT	6/19/03 MEETING OUTCOME / ACTION ITEM	RESOLUTION
				how can we resolve these 2 conflicting requirements).	
Miscellaneous	17	5.2.2.3	Sherwin-Williams proposes to change the reference to the Braddock residence to the street address of the residence (25 United States Avenue).	Reference to 'Braddock' will be removed from work plan. EPA to determine if address should be included in the work plan.	Address should be included in the RI/FS Work Plan. Addresses will be redacted from the copies of the RI/FS Work Plan that will be placed in the public repositories.